

EXHIBIT A

Local 7.1 Meet and Confer: Seeking Concurrence or Opposition on Motion for Leave to File Reply

From: Britt Martin bmartin0211@outlook.com
To: Hatch, Daniel hatchd@butzel.com, Burk, Tyler A. burkt@butzel.com, Silver, Lee silver@butzel.com, Gutierrez, Michael gutierrez@butzel.com
Date: Thu, Jul 11, 2024, 4:14 PM

All,

I am writing to address the blatant falsehoods and malicious misrepresentations in your recent filing (ECF No. 83) opposing my motion for leave to file a reply in support of my motion for summons. Once again, I have no choice but to file a motion for leave to reply to correct your bald face lies and false accusations.

Your filing contains numerous false and damaging statements, including:

"Plaintiffs' filings reflect a plethora of baseless conspiracies regarding our justice system. ECF 17, PageID.249-255. However, it is wholly improper for Plaintiff to baselessly accuse or suggest this Court of having ex parte communications with counsel for Defendants or directing an action in this matter without issuing an order."

Additionally, you falsely assert that:

"Plaintiff alleges that counsel for Defendants 'slipped and revealed that Magistrate Berens refused to issue the summonses, then quickly backtracked.' ECF 77-1; PageID.1764. To be clear, Counsel for Defendants have no knowledge of this alleged action and have never stated or suggested anything to support such an outlandish conspiracy theory."

These statements are complete fabrications. During our June 14, 2024, phone conference, your team explicitly admonished me for seeking to file a motion requesting the court to order the issuance and service of summonses because it would be requesting Magistrate Berens to take action she had already ordered or decided upon. You stated that when the magistrate files and strikes a summons, you can't just then go back to the magistrate and say you need to issue the summons. Surprised, I responded that I was not aware Magistrate Berens had done so and thought it was the clerk's action. You then backtracked, claiming to have misspoken, but emphasizing that I would still need to appeal that.

My motion was addressing this very issue because there was no formal order entered. If Magistrate

Berens directed the court not to issue my summons, and that is the actual determination that he could appeal it. An electronic notification alone is insufficient grounds for an appeal.

This directly contradicts your assertions and undermines your accusations of impropriety on my part. Your continuous attempts to damage my credibility with the justice system are unwarranted and unacceptable.

In accordance with local rules, I am obligated to seek your concurrence on this matter. Please confirm whether you will concur with or oppose this motion for leave to file a reply to set the record straight.

Your persistent falsehoods and baseless accusations are a serious ethical breach. Given the gravity of this deceitful conduct, I am also preparing to file a motion for sanctions to address this matter appropriately.

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